



Delivering Platform Operator
Training in North America



INTERNATIONAL POWERED
ACCESS FEDERATION

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OSHA Docket Office
Docket No. OSHA-2009-0045
U.S. Department of Labor
Occupational Safety and Health Administration
Room N-26625
200 Constitutional Ave. NW.
Washington, DC 20210

RE: Strategic Aerial Lifts; Extension of the office of Management and Budget's (OMB) Approval of an Information Collection (Paperwork) Requirement, Request for Information, Docket No. OSHA – 2009-0045

To Whom It May Concern:

The International Powered Access federation (IPAF) is a not-for-profit organization which represents manufacturers, dealers, and users (union and non-union) of aerial work platforms. AWPT, Inc. is IPAF's wholly owned subsidiary that oversees member developed and delivered operator training programs. Our members and approved training centers strongly support the collection requirement for the certification requirement that the manufacturer, or equally qualified entity, has assessed a modification to an aerial work platform and determined it to be safe for use.

Specifically, the actual language of the applicable Owner Modification Section of the A92 Standards is used throughout the industry which complements the OSHA Standard. For example, Section 6.16 of ANSI/SIA A92.5-2006 Boom-Supported Elevating Work Platforms states:

6.16 Modifications. The owner shall not modify or concur in modification or alteration to the aerial platform without the modifications being approved and certified in writing by the manufacturer.

The support is based upon the following reasons:

1. The design, qualification and quality assurance testing requirements of an aerial work platform are defined in the ANSI A92 standards. Compliance is required for manufacturing and remanufacturing. Any modification must be in compliance with these standards.
2. A modification is defined in the ANSI A92 standards as ‘ changes to an aerial platform with affect the operation, stability, safety factors, rated load, or safety of the aerial platform in any way. Unfortunately there are too many occurrences where a modification is made without any consideration to the affects of the modification and OSHA laws reinforce the necessity to have appropriate bodies review these modifications.
3. Most accidents that occur are the direct result of the user of the equipment making poor decisions. Providing accountability that all modifications to be made must be made in writing by the manufacturer is the only means to assure worker safety.
4. All safety training and instructions in the market support the requirement that modifications can only be made AFTER the written approval by the machine manufacturer. The reference to other qualified persons making modifications was intended to provide an option if the original machine manufacturer is out of business. The necessity of this requirement is essential as part of a work risk assessment.
5. Non-AWP manufacturer who are deemed as qualified may not have access to the overall design criteria used for the manufactured design of a specific aerial platform. While they may have the knowledge to design an ‘attachment’, they may not have any knowledge of the impact on the safety factors that may be additionally impacted on the Aerial lift.
6. Any and all modifications have an impact on the safe use of the aerial work platform. Significant impact on the machines operation, stability, safety factors, rated load, or safety can be impacted by modifications not approved through the review of the manufacturer.
7. Too many ‘off the shelf’ options are marketed that modify an aerial work platform. An unknowing user may purchase and attach this option to an AWP without regard to the impact on the safe use of the AWP, such as weather or paint enclosures. Having OSHA’s continued regulation to require certification from the manufacturer will require the employer to verify any modification to the aerial lift is safe.
8. Too often field modifications are made to address the use of a particular model AWP on the site rather than addressing the correct machine for the application.
9. In applications where an approved modification has been made on a particular aerial platform, non-qualified personnel may assume that the application is universally OK and apply the modification in other application. The requirement to have written authorization will be unit specific and minimize this risk.
10. The definition of a “equally qualified entity” as it pertains to design of a machine modification does not provide sufficient limitation to encompass the requirements that

address “changes to an aerial platform with affect the operation, stability, safety factors, rated load, or safety of the aerial platform in any way. When a user requests an ‘engineer’ to design a ‘widget’ – unless specifically addressing its safe use as a modification to an aerial work platform, the modification design is not complete. The specific requirement to have written certification for use on an aerial platform so as to assure the safe use in the operation, stability, safety factors, rated load, or safety of the aerial platform - they are not addressing the safety of the occupants of the aerial platform.

11. OSHA’s law and while ANSI provides industry consensus standards, OSHA’s is needed to place a stronger deterrent to those who inappropriately modify an aerial platform.

Manufacturer’s have many ‘approved modification” already completed or options that assist users with specific applications. Below is a list of some offered. Manufacturer design and manufacture special machines on a frequent basis and can be approached to develop new options to meet customers’ needs both safely and effectively.

- pipe racks
- material handlers
- glazing packages
- outriggers
- inverters
- generators
- welders
- compressed air
- 110 to platform
- lights
- tool holders
- extension decks
- power decks
- aircraft bumpers
- additional anchor points
- EE, EX, DX rated units for hazardous environments
- hostile environment packages
- cold weather packages
- arctic packages
- elevated access gate interlock kits

12. See attached pictures of common occurrences where aerial lifts are modified inappropriately and place workers at risk. The continued requirement by OSHA to require a written certification from the manufacturer is the most effective process to assure any modification made is appropriate.

We hope that OSHA listens to the voice of IPAF members who are industry experts and believe that worker safety is the most important aspect in maintaining the requirement to extend OMB approval of the information collection requirement contained in the Aerial Lift Standard. The requirement to maintain the responsibility through the aerial lift manufacturer will be the best

assurance that all aspects of safe design in the complete operation of the aerial lift will be maintained.

I may be contacted if required for any questions, comments, additional information or follow-up.

Best regards,

Tony Groat
IPAF North American country representative
AWPT executive V.P.
ANSI A92 committee member